

# EXHIBIT 124

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK**

STATES OF NEW YORK,  
MASSACHUSETTS,  
WASHINGTON, COLORADO,  
CONNECTICUT, DELAWARE,  
DISTRICT OF COLUMBIA,  
HAWAII, ILLINOIS, IOWA, NEW  
MEXICO, NORTH CAROLINA,  
OREGON, PENNSYLVANIA,  
RHODE ISLAND, VERMONT, and  
VIRGINIA,

Plaintiffs,

v.

DONALD TRUMP, in his official  
capacity as President of the United  
States; U.S. DEPARTMENT OF  
HOMELAND SECURITY; ELAINE  
C. DUKE, in her official capacity; U.S.  
CITIZENSHIP AND IMMIGRATION  
SERVICES; U.S. IMMIGRATION  
AND CUSTOMS ENFORCEMENT;  
and the UNITED STATES OF  
AMERICA,

Defendants.

CIVIL ACTION NO. 1:17-cv-05228  
(NGG) (JO)



## DEPARTMENT OF BUSINESS, ECONOMIC DEVELOPMENT & TOURISM

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### DECLARATION OF LUIS P. SALAVERIA

I, LUIS P. SALAVERIA, do declare and would competently testify as follows:

1. I am the Director of the State of Hawaii Department of Business, Economic Development and Tourism (DBEDT). I have held this position since December 2014. Prior to this position, I served as the State of Hawaii's Deputy Director of Finance from 2011 to 2014.
2. As Director, I lead DBEDT's efforts to achieve a Hawaii economy that embraces innovation and is globally competitive, dynamic and productive, providing opportunities for all Hawaii's citizens.
3. As part of my responsibilities as Director, I work closely with the Hawaii business community to understand and help address the issues our businesses face as they strive for economic viability and success.
4. Hawaii businesses rely heavily on immigrants, who bring their talent, knowledge and expertise to our labor force.
5. The Research & Economic Analysis Division of DBEDT (READ) works to enhance and contribute to the economic development of Hawaii by providing analyses and policy recommendations on economic issues. READ provides economic forecasts that contribute to long-term statewide planning and infrastructure needs assessment, and also conducts and reports on basic research into the economy of Hawaii. These functions are conducted by collecting, compiling, interpreting, and publishing data and statistics on all aspects

of business activity, the economy, and demographic characteristics of Hawaii. READ also developed and maintains a statewide statistical reporting system.

6. READ compiles, among other information, statistics on Hawaii's unemployment rate.

7. According to our statistics, Hawaii's unemployment rate during the first 8 months of 2017 was 2.7%, the third lowest rate in the nation.

8. Because of Hawaii's low unemployment rate, Hawaii businesses have had difficulty filling their vacant positions.

9. I am aware of the federal program or policy known as DACA – Deferred Action for Childhood Arrivals. It is my understanding that DACA allows those individuals who meet its eligibility requirements to live, study, and work in the United States without fear of deportation.

10. According to a report on a website maintained by the U.S. Department of Homeland Security, as of June 30, 2017, 582 initial and 2,179 renewal DACA requests have been approved by the federal government for Hawaii residents.

[https://www.uscis.gov/sites/default/files/USCIS/Resources/Reports%20and%20Studies/Immigration%20Forms%20Data/All%20Form%20Types/DACA/daca\\_performancedata\\_fy2017\\_qtr3.pdf](https://www.uscis.gov/sites/default/files/USCIS/Resources/Reports%20and%20Studies/Immigration%20Forms%20Data/All%20Form%20Types/DACA/daca_performancedata_fy2017_qtr3.pdf).

I am aware through the media and through discussions with others that the federal government has announced it is winding down DACA. It is my understanding that once DACA grantees' authorizations to live and work in the United States expire, DACA grantees will no longer be eligible for employment in Hawaii.

11. Given the already low unemployment rate in Hawaii, and the difficulty employers have had finding employees to fill vacant positions, the departure of the DACA population from

Hawaii's workforce would cause even greater difficulty for Hawaii employers, and have a negative impact on Hawaii's economy.

12. I declare under penalty of law that the foregoing is true and correct to the best of my knowledge.

DATED: Honolulu, Hawaii, September 25, 2017.



LOUIS P. SALAVERIA